

Joshua Adam Schulte, *pro se*

December 9, 2021

**BY HAND**

Judge Jesse M. Furman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: *United States v. Joshua Adam Schulte*, S3 17 Cr. 548 (JMF)**

Dear Judge Furman:

I write to request deadline extensions due to the government's failure to provide contemporaneous service of its motions and due to the MDC's continued law library availability issues.

As an initial matter, the MDC's law library continues to be inoperable—it was down again on Monday, December 6<sup>th</sup> and Tuesday, December 7<sup>th</sup>. I barely had time in the two-hour allotment on Wednesday, December 8<sup>th</sup> to complete caselaw review for the two motions that were due that day. I will have no access to the law library today or Friday due to the SCIF, and limited access the next several weeks provided the law library is not, once again, inoperable, in which case I will have no access.

Due to this ongoing issue as well as the delayed service of the government's supplemental opposition to the cellphone suppression, I am unable to meet the Court's 12/13/21 deadline for the reply. I ask the Court to extend time until the end of the week, Friday, December 17, 2021.

Next, the government has not reached out to me nor responded to my letter seeking to confer about the protective orders in this case as directed by the Court on 11/12/21, Dkt. 585. We therefore cannot meet the Court's proposed 12/13/21 deadline.

On November 19, 2021 you granted me permission to file a motion to suppress the Google, GitHub, and Reddit search warrant as well as a motion for severance/bifurcation of the MCC/WikiLeaks counts of the indictment. Dkt. 610. It will be extremely difficult at this point to

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meet the Court's December 23, 2021 deadline for both motions; I only became aware of the Court's letter after my Counsel provided it to me on December 3, 2021 after the government failed to do so. Accordingly, I ask the Court to grant me the full 25-page motion limitation for the Google, GitHub, and Reddit suppression motion, to be due on the Court's original December 23, 2021 deadline. I then ask the Court additional time to file the MCC severance/bifurcation motion, and in fact, due to the pending MCC Dismissal Motion, ask the Court to stay setting a deadline on the MCC severance/bifurcation motion, which would be moot after the Court grants the MCC Dismissal Motion. If not, I ask until January 13, 2021 to file the full 25-page severance/bifurcation motion. I thank the Court for understanding my precarious position.

Respectfully submitted,

Joshua Adam Schulte

A handwritten signature in black ink, appearing to read 'J. Schulte', written in a cursive style.